



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF: SR-6J

November 19, 2008

Mr. Tom Harmening, City Manager  
City of St. Louis Park  
5065 Minnetonka Boulevard  
St. Louis Park, MN 55416

Mr. John Jones, Dir. of Regulatory Management  
Reilly Industries  
300 North Meridian Street, Suite 1500  
Indianapolis, IN 46204-1763

RE: Reilly Tar Superfund Site, DNAPL Recovery Proposal

Dear Mr. Harmening and Mr. Jones:

The Minnesota Pollution Control Agency (MPCA) and the United States Environmental Protection Agency (U.S. EPA) received the letter of August 7, 2007 proposing to recover dense non-aqueous phase liquid (DNAPL) from Platteville Aquifer source control well W421 ("W421"). The Agencies approve the recovery of DNAPL from W421 with the following conditions:

- 1) During the removal of DNAPL, the well will continue to be pumped for the purpose of source control in the same manner as it was before the DNAPL was discovered.
- 2) A revised work plan will be submitted and consider alternative methods for increasing DNAPL mass flux through the aquifer to the well bore. A pilot test may be necessary.
  - a) The Agencies are concerned that the DNAPL recovery method described in the August 7, 2008 Work Plan may not be capable of influencing DNAPL product much beyond the existing well bore.
  - b) DNAPL recovery efforts may be affected by the presence of impermeable or plastic layer, such as the Dickey bentonite within the Carimona member of the Platteville limestone. Boring logs for wells listed below should be provided along with the revised Work Plan. If data suggests that impermeable layers may impede DNAPL flow to the recovery well, the revised Work Plan should make provisions to overcome that obstacle.
  - c) The Work Plan should include additional data to characterize the conditions at the site relative to the DNAPL present in well W421.
  - d) A site map should be provided that shows the locations of wells W421, W420, W423, and other wells located in close proximity.

The Agencies request that the proposed removal of DNAPL from well W421 be initiated within 30 days of receipt of this letter; and the revised Work Plan be submitted within 60 days of receipt of this letter. During preparation of the revised Work Plan, well W421 is to be pumped as indicated in item 1.

If you have any questions in this matter feel free to call Nile Fellows at (651) 296-7299 or Matt Ohl at (312) 886-4442.

Sincerely,

*Laura J. Ripley*  
*for Nile Fellows*

Nile Fellows, Project Leader  
Superfund Unit 1  
Superfund and Emergency Response Section  
Remediation Division  
Minnesota Pollution Control Agency

*Laura J. Ripley*  
*for Matthew J. Ohl*

Matthew J. Ohl  
Remedial Project Manager  
Superfund Division  
United States Environmental Protection Agency

NF/DO:csa

Enclosure

cc: Mike Rardan, City of St. Louis Park  
Virginia Yingling, MDH  
William M. Gregg, ENSR  
Thomas Nash, EPA-ORC